

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SEP 22 2021

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRITTISH "CIERRAH" WILLIAMS,

Defendant.

4:21CR528 HEA/JMB

INDICTMENT

The Grand Jury Charges:

COUNTS ONE THROUGH FIVE

(Misuse of a Social Security Number)

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

BRITTISH "CIERRAH" WILLIAMS,

with the intent to deceive, and for the purpose of obtaining anything of value from another person and for any other purpose, did falsely represent a number to be the Social Security account number assigned by the Commissioner of Social Security to **BRITTISH "CIERRAH" WILLIAMS,** when in fact such number is not the Social Security Number assigned by the Commissioner of Social Security to **BRITTISH "CIERRAH" WILLIAMS,** to wit: the defendant represented the below listed Social Security Numbers to be **BRITTISH "CIERRAH" WILLIAMS'** for the purpose of obtaining loans, lines of credit, or other monies from the below named financial institution and creditors:

COUNT	DATE	COMPANY OR CREDITOR	SSN USED
1	November 8, 2017	Heights Financial	***-**-0471
2	September 20, 2017	Discover	***-**-0471
3	September 13, 2017	TD Retail Card Services	***-**-0471
4	March 14, 2017	USAA Savings Bank	***-**-9292
5	September 6, 2017	Navy Federal Credit Union	***-**-0471

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNTS SIX THROUGH NINE

(Bank Fraud)

INTRODUCTION

1. At all times relevant to the Indictment, the financial institutions listed in the tables below in Paragraphs 3, 4, and 6 were all financial institutions within the meaning of 18 U.S.C. § 20 and were insured through the Federal Deposit Insurance Corporation.

THE SCHEME TO DEFRAUD

2. Beginning on or about March 13, 2018, in the Eastern District of Missouri, the defendant, **BRITTISH “CIERRAH” WILLIAMS**, aided and abetted by individuals known and unknown to the Grand Jury, devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

MANNER AND MEANS

The Scheme and artifice to defraud was in substance as follows:

3. Beginning in 2018, Defendant opened bank accounts with different business names, personal names, and Social Numbers, as listed below:

Date	Bank	Name and SSN Used	Business Name Used
3/13/2018	Busey Bank	BRITTISH "CIERRAH" WILLIAMS -3303	Label Whoree
9/21/2018	Busey Bank	Cierrah Williams -3304	BWGordon LLC
5/29/2019	First Bank	BRITTISH "CIERRAH" WILLIAMS -3305	BCW, LLC

4. It was further part of the scheme and artifice to defraud that the proceeds deposited by Defendant on or about the dates below into these bank accounts included checks from legitimate bank accounts, paid to the order of Defendant or one of Defendant's businesses, without the knowledge or consent of the account owners, as listed below:

Date of Deposit	Bank of Deposit	Victim Account Owner	Amount of Check
5/2/2019	Busey Bank	G.G.	\$4,500.00
5/9/2019	Busey Bank	E.C.	\$4,800.00
5/10/2019	Busey Bank	S.B.	\$4,850.33
7/3/2019	First Bank	E.C.	\$4,728.00

5. It was further part of the scheme and artifice to defraud that once Defendant deposited these checks, she subsequently withdrew the proceeds in cash. When the illegitimate checks were then returned for insufficient funds, the above-listed banks incurred a loss.

COUNTS SIX THROUGH NINE

(Bank Fraud)

6. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

BRITTISH "CIERRAH" WILLIAMS,

aided and abetted by persons known and unknown to the Grand Jury, did knowingly execute a scheme and artifice to obtain the money, funds, or other property owned by or under the control of the banks listed below, by means of material false or fraudulent pretenses, representations or promises, in that **BRITTISH "CIERRAH" WILLIAMS** did deposit fraudulent checks into these bank accounts, knowing that **BRITTISH "CIERRAH" WILLIAMS** was not a legitimate recipient of those funds and had no authorized or legal purpose for accepting the funds, and later withdrew the proceeds from these checks in cash from the Banks of Deposit:

Count	Date of Deposit	Bank of Deposit	Victim Account Owner	Amount of Check
6	5/2/2019	Busey Bank	G.G.	\$4,500.00
7	5/9/2019	Busey Bank	E.C.	\$5,800.00
8	5/10/2019	Busey Bank	S.B.	\$4,850.33
9	7/3/2019	First Bank	E.C.	\$4,728.00

All in violation of Title 18, United States Code, Section 1344.

COUNTS TEN THROUGH TWELVE

(False Statements)

On or about the dates listed below, in the Eastern District of Missouri, the defendant,

BRITTISH "CIERRAH" WILLIAMS,

made and presented to the Internal Revenue Service a claim upon the Internal Revenue Service, that is, that the below listed individuals were her dependents, knowing that the claims were false and fraudulent in that these individuals were not her dependents:

COUNT	TAX YEAR	DATE OF TAX RETURN RECEIPT BY IRS	DEPENDANT(S) (STATED RELATIONSHIP)
10	2019	1/14/2020	R.M. (Nephew)
11	2018	2/5/2019	R.M. (Nephew)
12	2017	2/4/2018	R.M. (Nephew) and K.M. (Niece)

All in violation of Title 18, United States Code, Section 287.

COUNTS THIRTEEN THROUGH FIFTEEN

(Wire Fraud)

THE SCHEME TO DEFRAUD

7. The Government herein incorporates by reference Counts 13 through 15 of this Indictment.

8. Defendant caused to be prepared and submitted to the Internal Revenue Service (IRS) her personal Federal income tax returns claiming refunds and tax credits in excess of or in addition to the allowable amounts of refunds and credits.

9. Defendant caused the electronic submission of her U.S. Individual Income Tax Returns for tax years 2013 through 2018 from the Eastern District of Missouri using TaxAct

software. Defendant's tax returns did not identify a preparer.

MANNER AND MEANS

10. It was part of the scheme that Defendant used the names and Social Security Numbers of K.M. and R.M. on Defendant's tax returns in order to claim K.M. and R.M. as dependents during the relevant tax year(s), despite not providing for their care or expenses, in order to fraudulently increase the amount of the tax refund to which Defendant was entitled.

COUNTS THIRTEEN THROUGH FIFTEEN

(Wire Fraud)

11. On or about the dates set forth below, in the Eastern District of Missouri and elsewhere, the defendant,

BRITTISH "CIERRAH" WILLIAMS,

having devised and intended to devise a scheme to obtain money by means of materially false and fraudulent pretenses, representations and promises, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

COUNT	TAX YEAR	DATE OF TAX RETURN SUBMISSION	DEPENDANT(S) (STATED RELATIONSHIP)
13	2019	1/14/2020	R.M. (Nephew)
14	2018	2/5/2019	R.M. (Nephew)
15	2017	2/4/2018	R.M. (Nephew) and K.M. (Niece)

All in violation of Title 18, United States Code, Section 1343.

COUNTS SIXTEEN THROUGH EIGHTEEN

(Aggravated Identity Theft)

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

BRITTISH "CIERRAH" WILLIAMS,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the names and Social Security Numbers of the individuals listed below, knowing that the means of identification belonged to another actual person, during and in relation to the commission of the felony offense of wire fraud, Title 18, United States Code, Section 1343:

COUNT	NAME	DATE OF TAX RETURN FILING
16	K.M. and R.M.	2018
17	R.M.	2019
18	R.M.	2020

All in violation of Title 18, United States Code, Section 1028A.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1344 as set forth in Counts 6 through 12, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offenses.

3. If any of the property described above, as a result of any act or omission of the

defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

SAYLER A. FLEMING
United States Attorney

DIANE E.H. KLOCKE, 61670MO
Special Assistant United States Attorney